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6 UNITED STATES DISTRICT COURT  
7 WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

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10 FEDERAL TRADE COMMISSION, *et al.*,

11 Plaintiffs,

12 v.

13 AMAZON.COM, INC., a corporation,

14 Defendant.

15  
16 CASE NO. 2:23-cv-01495-JHC

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18 **STIPULATED MOTION AND  
19 ORDER TO SEAL CERTAIN  
20 EXHIBITS TO THE PARTIES' MAY  
21 28, 2025 JOINT STATUS REPORT**

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23 NOTE ON MOTION CALENDAR:  
24 June 11, 2025

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26 The parties, by and through their attorneys of record, respectfully request that the Court  
27 enter the proposed order set forth below, permanently sealing certain exhibits to the parties'  
28 May 28, 2025 Joint Status Report, ECF Nos. 485-1 and 485-2 (sealed exhibits).

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30 In support of this request, the parties represent the following to the Court:

31 1. On May 28, 2025, Amazon provisionally filed under seal the parties' Joint Status  
32 Report, ECF No. 484 (redacted submission), and three accompanying exhibits  
33 attached to that submission, one sealed (Exhibit B) and one with redactions  
34 (Exhibit C).

1 2. Pursuant to Local Civil Rule 5(g)(3)(A), undersigned counsel certify that they met  
2 and conferred to reach the agreement described in this Stipulated Motion. The  
3 following attorneys conferred by phone and by email on May 28, 2025, and  
4 June 9, 2025: Leigh Barnwell and Ed Takashima for the FTC; and Katherine  
5 Trefz for Amazon.

6 3. Amazon filed a public version of the Joint Status Report redacting certain  
7 language from an Amazon business document attached to the Joint Status Report  
8 as Exhibit B. The parties agree that these redacted portions can be unsealed.

9 4. The one sealed and one redacted exhibit accompanying the Joint Status Report,  
10 ECF Nos. 485-1 and 485-2, consist of an Amazon business document produced in  
11 this litigation and the deposition transcript of an Amazon witness. These  
12 documents are designated under the February 13, 2024 Protective Order in this  
13 case, ECF No. 160, and contain confidential business information, disclosure of  
14 which could cause Amazon economic and competitive harm.

15 5. The parties stipulate as follows, subject to Court approval, and jointly request that  
16 the Court enter the following Order approving this Stipulation:

17 a. the previously-sealed Joint Status Report, ECF 485, will be filed to the  
18 public docket;

19 b. only the highlighted portions in the redacted Exhibit C (the deposition  
20 transcript) accompanying the Joint Status Report, ECF No. 485-2, will  
21 remain sealed; and

22 c. the Amazon company business document attached as Exhibit B to the  
23 Joint Status Report, ECF No. 485-1, will remain sealed.

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STIPULATED MOTION AND ORDER  
TO SEAL CERTAIN EXHIBITS TO THE PARTIES'  
MAY 28, 2025 JOINT STATUS REPORT - 2  
CASE NO. 2:23-cv-01495-JHC

1 Stipulated to and respectfully submitted this 11th day of June, 2025, by:

2 **MORGAN, LEWIS & BOCKIUS LLP**

3  
4 By: s/ Molly A. Terwilliger  
5 Patty A. Eakes, WSBA #18888  
6 Molly A. Terwilliger, WSBA #28449  
7 1301 Second Avenue, Suite 3000  
8 Seattle, WA 98101  
9 Phone: (206) 274-6400  
10 Email: patty.eakes@morganlewis.com  
11 molly.terwilliger@morganlewis.com

12 **WILLIAMS & CONNOLLY LLP**

13 Heidi K. Hubbard (*pro hac vice*)  
14 John E. Schmidlein (*pro hac vice*)  
15 Kevin M. Hodges (*pro hac vice*)  
16 Jonathan B. Pitt (*pro hac vice*)  
17 Carl R. Metz (*pro hac vice*)  
18 Carol J. Pruski (*pro hac vice*)  
19 Katherine Trefz (*pro hac vice*)  
20 680 Maine Avenue SW  
21 Washington, DC 20024  
22 Phone: (202) 434-5000  
23 Email: hhubbard@wc.com  
24 jschmidlein@wc.com  
khodges@wc.com  
jpitt@wc.com  
cmetz@wc.com  
cpruski@wc.com  
ktrefz@wc.com

25 **COVINGTON & BURLING LLP**

26 Thomas O. Barnett (*pro hac vice*)  
27 Katherine Mitchell-Tombras (*pro hac vice*)  
28 One CityCenter  
29 850 Tenth Street, NW  
30 Washington, DC 20001-4956  
31 Phone: (202) 662-5407  
32 Email: tbarnett@cov.com  
33 kmitchelltombras@cov.com

34 *Attorneys for Defendant Amazon.com, Inc.*

1 *s/ Edward H. Takashima*  
2 SUSAN A. MUSSER (DC Bar # 1531486)  
3 EDWARD H. TAKASHIMA (DC Bar # 1001641)  
4 MICHAEL BAKER (DC Bar # 1044327)  
5 Federal Trade Commission  
6 600 Pennsylvania Avenue, NW  
7 Washington, DC 20580  
8 Tel.: (202) 326-2122 (Musser)  
9 (202) 326-2464 (Takashima)  
10 Email: smusser@ftc.gov  
11 etakashima@ftc.gov  
12 mbaker1@ftc.gov

13 *Attorneys for Plaintiff Federal Trade Commission*  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 s/ Michael Jo  
 2 Michael Jo (admitted *pro hac vice*)  
 3 Assistant Attorney General, Antitrust Bureau  
 4 New York State Office of the Attorney  
 5 General  
 6 28 Liberty Street  
 7 New York, NY 10005  
 8 Telephone: (212) 416-6537  
 9 Email: Michael.Jo@ag.ny.gov  
 10 *Counsel for Plaintiff State of New York*

11 s/ Timothy D. Smith  
 12 Timothy D. Smith, WSBA No. 44583  
 13 Attorney-in-Charge  
 14 Antitrust, False Claims, & Privacy Section  
 15 Oregon Department of Justice  
 16 100 SW Market St  
 17 Portland, OR 97201  
 18 Telephone: (503) 934-4400  
 19 Email: tim.smith@doj.state.or.us  
 20 *Counsel for Plaintiff State of Oregon*

21 s/ Victoria Field  
 22 Victoria Field (admitted *pro hac vice*)  
 23 Assistant Attorney General  
 24 Office of the Attorney General of  
 25 Connecticut  
 26 165 Capitol Avenue  
 27 Hartford, CT 06016  
 28 Telephone: (860) 808-5030  
 29 Email: Victoria.Field@ct.gov  
 30 *Counsel for Plaintiff State of Connecticut*

31 s/ Jennifer A. Thomson  
 32 Jennifer A. Thomson (admitted *pro hac vice*)  
 33 Senior Deputy Attorney General  
 34 Pennsylvania Office of Attorney General  
 35 Strawberry Square, 14th Floor  
 36 Harrisburg, PA 17120  
 37 Telephone: (717) 787-4530  
 38 Email: jthomson@attorneygeneral.gov  
 39 *Counsel for Plaintiff Commonwealth of*  
 40 *Pennsylvania*

41 s/ Alexandra C. Sosnowski  
 42 Alexandra C. Sosnowski (admitted *pro hac*  
 43 *vice*)  
 44 Assistant Attorney General  
 45 Consumer Protection and Antitrust Bureau  
 46 New Hampshire Department of Justice  
 47 Office of the Attorney General  
 48 One Granite Place South  
 49 Concord, NH 03301  
 50 Telephone: (603) 271-2678  
 51 Email: Alexandra.c.sosnowski@doj.nh.gov  
 52 *Counsel for Plaintiff State of New Hampshire*

53 s/ Michael A. Undorf  
 54 Michael A. Undorf (admitted *pro hac vice*)  
 55 Deputy Attorney General  
 56 Delaware Department of Justice  
 57 820 N. French St., 5th Floor  
 58 Wilmington, DE 19801  
 59 Telephone: (302) 683-8816  
 60 Email: michael.undorf@delaware.gov  
 61 *Counsel for Plaintiff State of Delaware*

62 s/ Robert J. Carlson  
 63 Robert J. Carlson (admitted *pro hac vice*)  
 64 Assistant Attorney General  
 65 Consumer Protection Unit  
 66 Office of the Oklahoma Attorney General  
 67 15 West 6th Street, Suite 1000  
 68 Tulsa, OK 74119  
 69 Telephone: (918) 581-2885  
 70 Email: robert.carlson@oag.ok.gov  
 71 *Counsel for Plaintiff State of Oklahoma*

72 s/ Christina M. Moylan  
 73 Christina M. Moylan (admitted *pro hac vice*)  
 74 Assistant Attorney General  
 75 Chief, Consumer Protection Division  
 76 Office of the Maine Attorney General  
 77 6 State House Station  
 78 Augusta, ME 04333-0006  
 79 Telephone: (207) 626-8800  
 80 Email: christina.moylan@maine.gov  
 81 *Counsel for Plaintiff State of Maine*

1 s/ Schonette Walker

Schonette Walker (admitted *pro hac vice*)  
 2 Assistant Attorney General  
 Chief, Antitrust Division  
 3 Office of the Maryland Attorney General  
 200 St. Paul Place  
 4 Baltimore, MD 21202  
 Telephone: (410) 576-6473  
 5 Email: [swalker@oag.state.md.us](mailto:swalker@oag.state.md.us)  
*Counsel for Plaintiff State of Maryland*

6 s/ Katherine W. Krems

Katherine W. Krems (admitted *pro hac vice*)  
 7 Assistant Attorney General, Antitrust  
 Division  
 8 Office of the Massachusetts Attorney  
 General  
 9 One Ashburton Place, 18th Floor  
 Boston, MA 02108  
 Telephone: (617) 963-2189  
 11 Email: [katherine.krems@mass.gov](mailto:katherine.krems@mass.gov)  
*Counsel for Plaintiff Commonwealth of Massachusetts*

13 s/ Scott A. Mertens

Scott A. Mertens (admitted *pro hac vice*)  
 14 Assistant Attorney General  
 Michigan Department of Attorney General  
 15 525 West Ottawa Street  
 Lansing, MI 48933  
 16 Telephone: (517) 335-7622  
 Email: [MertensS@michigan.gov](mailto:MertensS@michigan.gov)  
*Counsel for Plaintiff State of Michigan*

18 s/ Zach Biesanz

Zach Biesanz (admitted *pro hac vice*)  
 19 Senior Enforcement Counsel  
 Office of the Minnesota Attorney General  
 20 445 Minnesota Street, Suite 1400  
 Saint Paul, MN 55101  
 21 Telephone: (651) 757-1257  
 Email: [zach.biesanz@ag.state.mn.us](mailto:zach.biesanz@ag.state.mn.us)  
*Counsel for Plaintiff State of Minnesota*

s/ Lucas J. Tucker

Lucas J. Tucker (admitted *pro hac vice*)  
 Senior Deputy Attorney General  
 Office of the Nevada Attorney General  
 100 N. Carson St.  
 Carson City, NV 89701  
 Telephone: (775) 684-1100  
 Email: [LTucker@ag.nv.gov](mailto:LTucker@ag.nv.gov)  
*Counsel for Plaintiff State of Nevada*

s/ Andrew Esoldi

Andrew Esoldi (admitted *pro hac vice*)  
 Deputy Attorney General  
 New Jersey Office of the Attorney General  
 124 Halsey Street, 5th Floor  
 Newark, NJ 07101  
 Telephone: (973) 648-7819  
 Email: [andrew.esoldi@law.njoag.gov](mailto:andrew.esoldi@law.njoag.gov)  
*Counsel for Plaintiff State of New Jersey*

s/ Jeffrey Herrera

Jeffrey Herrera (admitted *pro hac vice*)  
 Assistant Attorney General  
 New Mexico Office of the Attorney General  
 408 Galisteo St.  
 Santa Fe, NM 87501  
 Telephone: (505) 490-4878  
 Email: [jherrera@nmag.gov](mailto:jherrera@nmag.gov)  
*Counsel for Plaintiff State of New Mexico*

s/ Zulma Carrasquillo Almena

Zulma Carrasquillo Almena (admitted *pro hac vice*)  
 Puerto Rico Department of Justice  
 P.O. Box 9020192  
 San Juan, Puerto Rico 00902-0192  
 Telephone: (787) 721-2900, Ext. 1211  
 Email: [zcarrasquillo@justicia.pr.gov](mailto:zcarrasquillo@justicia.pr.gov)  
*Counsel for Plaintiff Commonwealth of Puerto Rico*

1  
2 s/ Stephen N. Provazza  
3 Stephen N. Provazza (admitted *pro hac vice*)  
4 Special Assistant Attorney General  
5 Chief, Consumer and Economic Justice Unit  
6 Department of the Attorney General  
7 150 South Main Street  
8 Providence, RI 02903  
9 Telephone: (401) 274-4400  
10 Email: sprovazza@riag.ri.gov  
11 *Counsel for Plaintiff State of Rhode Island*

12  
13 s/ Sarah L.J. Aceves  
14 Sarah L.J. Aceves (admitted *pro hac vice*)  
15 Assistant Attorney General  
16 Public Protection Division  
17 Vermont Attorney General's Office  
18 109 State Street  
19 Montpelier, VT 05609  
20 Telephone: (802) 828-3170  
21 Email: Sarah.Aceves@vermont.gov  
22 *Counsel for Plaintiff State of Vermont*

23  
24 s/ Caitlin M. Madden  
25 Caitlin M. Madden (admitted *pro hac vice*)  
26 Assistant Attorney General  
27 Wisconsin Department of Justice  
28 Post Office Box 7857  
29 Madison, WI 53707-7857  
30 Telephone: (608) 267-1311  
31 Email: maddencm@doj.state.wi.us  
32 *Counsel for Plaintiff State of Wisconsin*

## ORDER

Pursuant to the parties' stipulation, the Court ORDERS:

- The previously-sealed Joint Status Report, ECF No. 485, (i.e., the main document, excluding the attached exhibits) will be filed on the public docket.
- The Amazon company business document attached as Exhibit B to the Joint Status Report, ECF No. 485-1, will remain sealed.
- It appears that the parties ask the Court to unseal all but the highlighted portions of the deposition transcript attached as Exhibit C to the Joint Status Report, ECF No. 485-2. But a version of this document with the highlighted portions remaining under seal is already attached to the public version of the Joint Status Report, ECF No. 484 at 38–53. Thus, the document at ECF No. 485-2 will remain sealed. If the parties believe that the Court has misunderstood their request as to this document, they may file another stipulated motion.

DATED this 12th day of June, 2025.

John H. Chun  
JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

STIPULATED MOTION AND ORDER  
TO SEAL CERTAIN EXHIBITS TO THE PARTIES  
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